

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

KAREN SUMMERSET and SARA TAYLOR, individually and on behalf of all others similarly situated,

Plaintiffs,

vs.

LIBERTY MUTUAL INSURANCE COMPANY,

Defendant.

Civil Action No. 1:25-cv-11121-PBS

**LIBERTY MUTUAL INSURANCE COMPANY'S MOTION  
FOR LEAVE TO FILE REPLY BRIEF IN SUPPORT OF ITS MOTION  
TO DISMISS PLAINTIFF SARA TAYLOR'S CLAIMS AND TO STRIKE CLASS**

Pursuant to Local Rule 7.1(b)(3), Defendant Liberty Mutual Insurance Company (“Liberty Mutual”) respectfully requests leave to file the Reply brief following this Motion For Leave in support of its Motion To Dismiss Plaintiff Sara Taylor’s Claims for lack of standing under Federal Rule of Civil Procedure 12(b)(1) and failure to state a claim under Federal Rule 12(b)(6), and its Motion To Strike Class under Federal Rules 12(f) and 23 as an impermissible fail-safe class (“Motion”). In support of its request for leave to file a Reply brief, Liberty Mutual states the following:

1. Permitting Liberty Mutual to file a concise Reply brief will afford Liberty Mutual the opportunity to address Plaintiffs’ Opposition and the arguments raised therein.
2. Liberty Mutual’s Reply would assist the Court in narrowing the issues raised in the parties’ arguments.
3. Liberty Mutual’s Reply would not cause any delay in the resolution of its Motion or the progression of this case.

WHEREFORE, Liberty Mutual respectfully requests that this Court grant it leave to file a Reply brief in support of its Motion.

Dated: December 31, 2025

Respectfully Submitted,  
Liberty Mutual Insurance Company,  
By its attorney,

/s/ Kevin P. Polansky

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**CERTIFICATE OF SERVICE**

I, Kevin P. Polansky, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

Dated: December 31, 2025

/s/ Kevin P. Polansky

Kevin P. Polansky